

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: *Federal-State Joint Board on Universal Service Petition by Cellular Properties, Inc., for Commission Agreement in Redefining the Service Areas of Illinois Consolidated Telephone Company and Wabash Telephone Cooperative, Inc. in the State of Illinois Pursuant to 47 C.F.R. Section 54.207(c), CC Docket No. 96-45*

Dear Ms. Dortch:

On June 17, 2009 I, on behalf of Cellular Properties, Inc. met with Julie Veach, Acting Chief, Wireline Competition Bureau, and Alex Minard of the Wireline Competition Bureau. I presented the attached handouts and explained that the Commission should allow Cellular Properties' redesignation petitions for both Illinois Consolidated Telephone Company and Wabash Telephone Co. become effective without initiating a further proceeding. Both of these redesignations were expressly approved by the Illinois Commerce Commission, which specifically reviewed and evaluated the potential for creamskimming, and found that the proposed redesignations did not present a danger of creamskimming. Although the Illinois Commerce Commission reviewed the density ratios for Wabash including two exchanges that it excluded from Wabash's ETC area, it clearly was aware that it was excluding those exchanges and that exclusion did not affect its overall assessment of the potential for creamskimming. In this situation, there is no need for the Commission to "second guess" the ICC, which is much more familiar with these areas, particularly in light of the only minor differences in variation in density between the areas to be served by Cellular Properties and those that would not be served.

In addition, the fact that the Bureau initiated further proceedings with respect to the Triangle Communications Systems petition (DA-07-3791) and the US Cellular petition for Nebraska (DA 08-130), as well as Alltel in the Central Telephone Co. of Virginia and Verizon South – Virginia study areas, those decisions do not require initiating a proceeding here. Both Triangle and US Cellular Nebraska those public notices predated

the Commission's adoption of the CETC cap. Moreover, in each case, either the population density ratio of served to unserved areas or the absolute difference in densities between the served and unserved areas distinguish those cases from Cellular Properties' Wabash petition. The following chart summarizes the densities involved in each case:

Applicant – Study Area	Served pop. density	Unserved pop. density	Ratio	Absolute Difference
Alltel – Central Tel. Co. – VA	88.04	65.52	1.34	22.52
Alltel – Verizon South – VA	74.65	53.89	1.39	20.76
Triangle – Central Montana	6.12	1.80	3.40	4.32
US Cellular Nebraska - Hartmann	2.70	1.50	1.77	1.20
Cellular Properties - Wabash	19.89	13.76	1.44	6.13

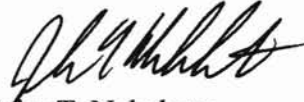
Thus, although the Alltel study areas had lower density ratios, they actually had a substantially larger divergence in population densities between the served and the unserved areas. The converse is true for Triangle and US Cellular Nebraska, where the density ratio was higher, but the actual difference between the served and unserved areas was lower than for Cellular Properties - Wabash.

In any event, it is not clear what a redesignation proceeding would accomplish here. This petition is uncontested, and it is unlikely that such a proceeding would yield significantly more material information than is already in the record. The Illinois Commerce Commission has already approved these redesignations. In light of the adoption of the CETC cap, the Commission should allow both of the Cellular Properties redesignation petitions to become effective July 2, 2009.

Ms. Marlene H. Dortch
June 18, 2009
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Please do not hesitate to contact me if you have any questions.

Sincerely,

A handwritten signature in black ink, appearing to read 'John T. Nakahata', written in a cursive style.

John T. Nakahata
Counsel to Cellular Properties, Inc.

cc: Julie Veach
Alex Minard
Jennifer Prime